

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

This document relates to:
All Actions

No. 19-md-2875-RBK-KW

Honorable Robert Kugler
Magistrate Karen Williams
Special Master Thomas Vanaskie

**PLAINTIFFS' NOTICE OF MOTION TO
COMPEL THE PRODUCTION OF
DOCUMENTS WITHHELD AS CHINESE
STATE SECRETS**

To: Seth A. Goldberg
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PLEASE TAKE NOTICE that on a date as soon as June 7, 2021, or as soon thereafter as counsel may be heard, Plaintiffs, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler, the Honorable Karen M. Williams, and the Honorable Special Master Thomas I. Vanaskie, for an ORDER compelling the production of documents withheld as Chinese state secrets, or alternatively for other relief as specified in Plaintiffs' memorandum of law.

Dated: May 10, 2021

Respectfully Submitted,

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